

**REMARKS**

**INTRODUCTION:**

In accordance with the foregoing, claim 1 has been amended. No new matter is being presented, and approval and entry are respectfully requested.

Claims 1-47 are pending and under consideration. Reconsideration is requested.

**ENTRY OF AMENDMENT UNDER 37 C.F.R. § 1.116:**

Applicant(s) request(s) entry of this Rule 116 Response because the amendment of claim 1 should not entail any further search by the Examiner since no new features are being added or no new issues are being raised; and the amendment does not significantly alter the scope of the claims and place the application at least into a better form for purposes of appeal. No new features or new issues are being raised.

The Manual of Patent Examining Procedures sets forth in Section 714.12 that "any amendment that would place the case either in condition for allowance or in better form for appeal may be entered." Moreover, Section 714.13 sets forth that "the Proposed Amendment should be given sufficient consideration to determine whether the claims are in condition for allowance and/or whether the issues on appeal are simplified." The Manual of Patent Examining Procedures further articulates that the reason for any non-entry should be explained expressly in the Advisory Action.

**ENTRY OF AMENDMENT UNDER 37 C.F.R. § 1.116:**

On September 24, 2003 an Information Disclosure Statement was filed at the U.S. Patent and Trademark Office. However, a PTO-1449 form acknowledging the references submitted in the IDS has not been received for the IDS filed on September 24, 2003. Applicants respectfully request that the IDS be considered.

**REJECTION UNDER 35 U.S.C. § 103:**

*In the Office Action, at page 2, claims 1, 4, 6, 7, 10, 12, 13, 16, 18, 19, 22, 24, 25, 28, 30-32, 35, 37-40, and 45-57 were rejected under 35 U.S.C. § 103 in view of U.S. Patent No. 6,078,923 to Burrows ("Burrows") and U.S. Patent No. 6,438,556 to Malik et al. ("Malik"). The reasons for the rejection are set forth in the Office Action and therefore not repeated. The rejection is traversed and reconsideration is requested.*

Burrows generally provides a search engine 140 including means for parsing pages, means for indexing the parsed pages, means for searching the index, and means for presenting information about the pages 200 located. See column 3, lines 60-67. Further, Burrows breaks down the portions of information of the pages 200 into fundamental indexable elements or atomic pairs. See column 4, lines 36-38. However, Burrows fails to teach or suggest, "dividing data and index data into a plurality of sections," as recited in independent claim 1. Rather, in Burrows the pages are parsed and information therein is divided into indexable elements. The cited reference fails to provide that the information therein and index data are parsed into a plurality of sections.

Furthermore, according to Burrows, each index entry includes a word entry if the index entry represents a compressed encoding of a unique portion of information sequentially parsed from the database. See column 2, lines 7-12. The word entry is followed by one or more location entries. However, the cited reference fails to teach or suggest, "wherein the index data is different from and corresponds to the data and is used to search or retrieve the data and each of the sections," as recited in independent claim 1. Nothing in Burrows indicates that the index entry is different from and corresponds to the word entry. As previously indicated, the index entry, the information, and the word entry are not divided into a plurality of sections, and accordingly, the index entry cannot be used to search or retrieve the information or the word entry and each of the sections.

Burrows fails to teach or suggest, "compressing each of the sections using a plurality of compression parameters to obtain a compressed file," as recited in independent claim 1, "where each of the sections comprises the data and the index data." Rather, the cited reference provides that each data structure 1001 includes two disk files, where one file is used to store a portion of a compressed data structure and the compressing may be performed using Huffman or Lempel-Ziv codings. See column 12, lines 14-18, and column 14, lines 13-15. Nothing in Burrows teaches or suggests that the data structure includes data and index data, which each data structure is then compressed using compression parameters.

The Office Action correctly recognized that Burrows fails to teach or suggest, "storing the compressed file in a storage medium together with address information and compression parameters of the sections after compression," as recited in independent claim 1. Accordingly, the Office Action refers to Malik as providing such claimed feature.

Malik generally describes a system and method to compress data on a computer system. See columns 3, 7, and 11. The method of Malik separates the data into a plurality of segments, provides code words, each corresponding to a segment of the plurality of segments,

and provides a representation of the data; the representation includes the code words, which replace the segments. However, similarly to Burrows, Malik fails to teach or suggest that the compressed file is obtained by “compressing each of the sections,” where each includes data and index data,” and where “the index data is different from and corresponds to the data and is used to search or retrieve the data and each of the sections,” as recited in independent claim 1. Thus, one cannot pick and choose among isolated disclosures in Burrows and Malik to deprecate the claimed invention. The combination of the cited references fails to teach or suggest all the claimed features recited in independent claim 1.

Because independent claims 7 and 13 include similar claim features as those recited in independent claim 1, although of different scope, the arguments presented above supporting the patentability of independent claim 1 are incorporated herein to support the patentability of independent claims 7 and 13. It is respectfully requested that independent claims 1, 7, and 13 and related dependent claims be allowed.

Independent claim 19 recites, “a region storing a compressed file which is divided into a plurality of sections which are compressed using a plurality of compression parameters; and a region storing address information of the sections and the compression parameters thereof, wherein each of the sections comprises data and index data, where the index data is different from and corresponds to the data, and the data comprises at least one of text data, image data, and audio data, and the index data is used to search or retrieve the data.” Independent claim 25 recites, “a reading step which accesses a storage medium which stores a plurality of compression parameters, address parameters, and a compressed file, an original file being divided into a plurality of sections . . . , wherein each of the sections comprises data and index data, where the index data is different from and corresponds to the data, and the data comprises at least one of text data, image data, and audio data, and the index data is used to search or retrieve the data.” Further, independent claim 32 recites, “a reading process section to control an access to a storage medium which stores a plurality of compression parameters, address parameters, and a compressed file, an original file being divided into a plurality of sections . . . , wherein each of the sections comprises data and index data, where the index data is different from and corresponds to the data, and the data comprises at least one of text data, image data, and audio data, and the index data is used to search or retrieve the data.” Because independent claims 19, 25, and 32 include similar claim features as those recited in independent claim 1, although of different scope, the arguments presented above supporting the patentability of independent claim 1 are incorporated herein to support the patentability of independent claims 19, 25, and 32. It is respectfully requested that independent claims 19, 25, and 32 and related

dependent claims be allowed.

*In the Office Action, at page 13, claims 2, 8, 14, 20, 26, 33, and 41 were rejected under 35 U.S.C. § 103 in view of Burrows, Malik, and U.S. Patent No. 5,951,623 to Reynar et al. ("Reynar"). The reasons for the rejection are set forth in the Office Action and therefore not repeated. The rejection is traversed and reconsideration is requested.*

Because claims 2, 8, 14, 20, 26, 33, and 41 depend from independent claims 1, 7, 13, 19, 25, 32, and 40, respectively, all the claimed features of the independent claims must be shown in the cited references individually or combined. The arguments provided above supporting the patentability of independent claims 1, 7, 13, 19, 25, 32, and 40 in view of Burrows and Malik are incorporated herein.

Referring to Reynar, the reference provides an adaptive compression technique that is an improvement to Lempel-Ziv compression techniques to reduce transmission time of data from point to point. Once most frequent "words" for each type of the data are discovered, a dictionary for each type of data can be created. See column 14, lines 13-18 of Reynar. This dictionary, in conjunction with an initially empty dictionary, to which new "words" will be added, will then be used to perform the Lempel-Ziv compression. However, similarly to Burrows and Malik, Reynar fails to teach or suggest, "dividing data and index data into a plurality of sections, wherein the index data is different from and corresponds to the data and is used to search or retrieve the data and each of the sections," as recited in independent claim 1. Further, the cited reference is silent as to teaching or suggesting that "each of the sections comprises the data and the index data, and the data comprises at least one of text data, image data, and audio data; and storing the compressed file in a storage medium together with address information and compression parameters of the sections after compression," as recited in independent claim 1. Thus, assuming *arguendo* that Burrows, Malik, and Reynar are combined, the combination thereof would fail to teach or suggest all the claimed features recited in independent claim 1.

Because independent claims 7, 13, 19, 25, 32, and 40 include similar claim features as those recited in independent claim 1, although of different scope, the arguments presented above supporting the patentability of independent claim 1 are incorporated herein to support the patentability of independent claims 7, 13, 19, 25, 32, and 40. It is respectfully requested that independent claims 1, 7, 13, 19, 25, 32, and 40 and related dependent claims be allowed.

*In the Office Action, at page 14, claims 3, 9, 15, 21, 27, 34, 39, 40, and 42 were rejected under 35 U.S.C. § 103 in view of Burrows, Malik, and U.S. Patent No. 6,438,556 to Benveniste ("Benveniste"). The reasons for the rejection are set forth in the Office Action and therefore not*

*repeated. The rejection is traversed and reconsideration is requested.*

Because claims 3, 9, 15, 21, 27, and 34 depend from independent claims 1, 7, 13, 19, 25, and 32, respectively, all the claimed features of the independent claims must be shown in the cited references individually or combined. The arguments provided above supporting the patentability of independent claims 1, 7, 13, 19, 25, and 32 in view of Burrows and Malik are incorporated herein.

Referring to independent claims 39 and 40, as previously set forth, Burrows and Malik is silent as to providing, "an original file being divided into a plurality of sections and compressed for each section using the plurality of compression parameters so as to obtain a plurality of section data forming the compressed file and the address information corresponding to a plurality of sections . . . wherein each of the sections comprises data and index data, where the index data is different from and corresponds to the data, and the data comprises at least one of text data, image data, and audio data, and the index data is used to search or retrieve the data," as recited in independent claims 39 and 40. Nothing in Burrows indicates that the index entry is different from and corresponds to the word entry. The index entry, the information, and the word entry are not divided into a plurality of sections, and accordingly, the index entry cannot be used to search or retrieve the information or the word entry and each of the sections.

Further, Malik provides code words, each corresponding to a segment. The method of Malik also provides a representation of the data, where the code words in the representation replace the segments, allowing the data to be access randomly. See abstract of Malik. However, nothing is taught or suggested in Malik where "each of the sections comprises data and index data, where the index data is different from and corresponds to the data, and the data comprises at least one of text data, image data, and audio data, and the index data is used to search or retrieve the data," as recited in independent claims 39 and 40.

Referring to Benveniste, this reference provides a FIFO implementation and determining whether a directory index for a segment is currently stored in the FIFO or not. See column 5, lines 57-67 of Benveniste. Also, Benveniste provides indicating the status of a segment with respect to its membership in a virtual uncompressed cache. In a case that the uncom0pressed flag is set to uncompressed, the remaining flags are unused and available for other uses. See column 6, lines 1-10 of Benveniste. However, similarly to Burrows and Malik, Benveniste fails to teach or suggest, "dividing data and index data into a plurality of sections, wherein the index data is different from and corresponds to the data and is used to search or retrieve the data and each of the sections," as recited in independent claim 1. Further, the cited reference is silent as to teaching or suggesting that "each of the sections comprises the data and the index data, and

the data comprises at least one of text data, image data, and audio data," as recited in independent claim 1. Thus, assuming *arguendo* that Burrows, Malik, and Benveniste were combined, the combination thereof would fail to teach or suggest all the claimed features recited in independent claim 1.

Because independent claims 7, 13, 19, 25, 32, 39, and 40 include similar claim features as those recited in independent claim 1, although of different scope, the arguments presented above supporting the patentability of independent claim 1 are incorporated herein to support the patentability of independent claims 7, 13, 19, 25, 32, 39, and 40. It is respectfully requested that independent claims 1, 7, 13, 19, 25, 32, 39, and 40 and related dependent claims be allowed.

*In the Office Action, at page 16, claims 5, 11, 17, 23, 29, 36, 43, and 44 were rejected under 35 U.S.C. § 103 in view of Burrows, Malik, and U.S. Patent No. 6,438,556 to Ikegami ("Ikegami"). The reasons for the rejection are set forth in the Office Action and therefore not repeated. The rejection is traversed and reconsideration is requested.*

Because claims 5, 11, 17, 23, 27 and 29, 36, 43 and 44 depend from independent claims 1, 7, 13, 19, 25, 32, and 40, respectively, all the claimed features of the independent claims must be shown in the cited references individually or combined. The arguments provided above supporting the patentability of independent claims 1, 7, 13, 19, 25, 32, and 40 in view of Burrows and Malik are incorporated herein.

Referring to Ikegami, this reference provides a description of the conventional Huffman coding method. See column 1, lines 45-67 of Ikegami. Further, when input data including a symbol string is compressed, bit maps are used. See abstract, column 17, lines 55-67, and column 18, lines 5-15 of Ikegami. In each bit map, "1" is set to a bit that represents the position of a relevant symbol of the symbol string. In contrast, "0" is set to a bit that represents the position of another symbol of the symbol string. However, similarly to Burrows and Malik, Ikegami fails to teach or suggest, "dividing data and index data into a plurality of sections, wherein the index data is different from and corresponds to the data and is used to search or retrieve the data and each of the sections," as recited in independent claim 1. Further, the cited reference is silent as to teaching or suggesting that "each of the sections comprises the data and the index data, and the data comprises at least one of text data, image data, and audio data," as recited in independent claim 1. Thus, assuming *arguendo* that Burrows, Malik, and Ikegami were combined, the combination thereof would fail to teach or suggest all the claimed features recited in independent claim 1.

Because independent claims 7, 13, 19, 25, 32, and 40 include similar claim features as

those recited in independent claim 1, although of different scope, the arguments presented above supporting the patentability of independent claim 1 are incorporated herein to support the patentability of independent claims 7, 13, 19, 25, 32, and 40. It is respectfully requested that independent claims 1, 7, 13, 19, 25, 32, and 40 and related dependent claims be allowed.

**CONCLUSION:**

In accordance with the foregoing, it is respectfully submitted that all outstanding objections and rejections have been overcome and/or rendered moot. And further, that all pending claims patentably distinguish over the prior art. Thus, there being no further outstanding objections or rejections, the application is submitted as being in condition for allowance which action is earnestly solicited. At a minimum, this Amendment should be entered at least for purposes of Appeal as it either clarifies and/or narrows the issues for consideration by the Board.

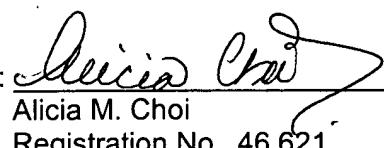
If the Examiner has any remaining issues to be addressed, it is believed that prosecution can be expedited and possibly concluded by the Examiner contacting the undersigned attorney for a telephone interview to discuss any such remaining issues.

If there are any underpayments or overpayments of fees associated with the filing of this Amendment, please charge and/or credit the same to our Deposit Account No. 19-3935.

Respectfully submitted,

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Date: 3/22/2007

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